



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Randy D. Eberts, Treasurer
Capitol Foundation Campaign Committee
P.O. Box 60
Jackson, MS 39205

DEC 18 1996

Identification Number: C00084368

Reference: October Quarterly Report (7/1/96-9/30/96)

Dear Mr. Eberts:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-The beginning cash balance of this report should equal the ending balance of your July Quarterly Report. Please clarify this discrepancy and amend any subsequent report(s) that may be affected by this correction.

-The Summary Page discloses \$670,125.69 on Line 6(c), Column B, but the Detailed Summary Page shows the Line 19 total to be \$644,129.69. These figures should be the same. Please amend your report accordingly.

-The totals listed on Lines 19, 20, 30, and 31, Column B of the Detailed Summary Page appear to be incorrect. Please be advised that you should add the "Calendar Year-to-Date" total from your previous report to the current "Total This Period" figure from Column A to derive the correct Column B totals. Please amend your report and any subsequent reports that may be affected by this correction.

-Your calculations for Line 31, Column A appear to be incorrect. FEC calculations disclose this amount(s) to be \$188,642.60. Please provide the corrected total(s) on the Detailed Summary Page.

-Schedule A of your report (pertinent portion(s) attached) discloses a contribution(s) which appears to exceed the limits set forth in the Act. 2 U.S.C. §441a(f) and 11 CFR §110.1(d) preclude a committee from

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receiving contributions from another political committee or person in excess of \$5,000 per calendar year.

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with the clarifying information. If the contribution(s) you received exceeded the limits, you must seek reattribution of the contribution pursuant to 11 CFR §110.1(k), transfer-out the amount in excess of \$5,000 to an account not used to influence federal elections or refund the excessive amount to the donor(s) in accordance with 11 CFR §103.3(b). In the best interest of your committee, all reattributions, transfers-out, and refunds should be made within sixty days of the treasurer's receipt of the contribution(s). In order to protect the donor's interests, the Commission recommends that you inform the contributor(s) in writing to provide the donor(s) with the option of granting written authorization for a reattribution or transfer-out to another account or receiving a refund.

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your check for the transfer-out or refund. In addition, any reattributions should be reported as memo entries on Schedule A of the report covering the period during which the authorization for the reattribution is received. Any transfers-out or refunds should be disclosed on Schedule B supporting Line 22 or 28 of the report during which the transaction was made.

Although the Commission may take further legal action regarding the acceptance of an excessive contribution(s), prompt action by your committee to seek reattribution, transfer-out or refund the excessive amount will be taken into consideration.

-Itemized disbursements must include a brief statement or description of why the disbursements were made. Please amend Schedule H4 of your report to clarify the following description(s): Reimbursement and Expense Reimbursement. For further guidance regarding acceptable purposes of disbursements, please refer to 11 CFR §104.3(b)(3).

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A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 219-3580.

Sincerely,

A handwritten signature in black ink, appearing to read "Richard Ng" with a stylized flourish at the end.

Richard Ng
Reports Analyst
Reports Analysis Division

SCHEDULE A

ITEMIZED RECEIPTS

FOR THE PERIOD: 07/01/96 TO 09/30/96

Use separate schedule(s)
for each category of the
Detailed Summary PagePAGE 29 OF 41
FOR LINE NUMBER
11.e.1.

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (in Full) Capitol Foundation Campaign Committee			
Full Name, Mailing Address, Zip Code	Name of Employer	Date (month, day, year)	Each Receipt this Period
Mr. James D. Powell 1250 S. Jackson St. Brookhaven, MS 39601	Occupation Self Employed	08/25/96	\$300.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other Specify: Federal		Aggregate Year-to-Date \$300.00	
Full Name, Mailing Address, Zip Code	Name of Employer	Date (month, day, year)	Each Receipt this Period
Mr. Kenneth Powell 521 R.B Wall Oil CO. Brookhaven, MS 39601	Occupation Self Employed	08/25/96	\$300.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other Specify: Federal		Aggregate Year-to-Date \$300.00	
Full Name, Mailing Address, Zip Code	Name of Employer	Date (month, day, year)	Each Receipt this Period
Mr. Chesley Pruet P. O. Box 31 El Dorado, AR 71731	Occupation Self Employed	07/19/96	\$10000.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other Specify: Federal		Aggregate Year-to-Date \$10000.00	
Full Name, Mailing Address, Zip Code	Name of Employer	Date (month, day, year)	Each Receipt this Period
Mr. Ben Puckett PO BOX 3170 Jackson, MS 39207-3170	Puckett Machinery Occupation Salesman	09/18/96	\$300.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other Specify: Federal		Aggregate Year-to-Date \$300.00	
Full Name, Mailing Address, Zip Code	Name of Employer	Date (month, day, year)	Each Receipt this Period
Mrs. Stephanie Patches 138 Duster Dr Hatchee, MS 39120-5277	Occupation Homemaker	07/03/96 08/05/96 08/20/96 09/03/96	\$15.00 \$15.00 \$500.00 \$15.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other Specify: Federal		Aggregate Year-to-Date \$1795.00	
Full Name, Mailing Address, Zip Code	Name of Employer	Date (month, day, year)	Each Receipt this Period
Mr. William Randolph 2223 Wild Valley Dr Jackson, MS 39211-6165	Utility Consulting Occupation President	09/24/96	\$200.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other Specify: Federal		Aggregate Year-to-Date \$300.00	
Full Name, Mailing Address, Zip Code	Name of Employer	Date (month, day, year)	Each Receipt this Period
Mr. Les G. Range PO BOX 9204 Jackson, MS 39286-9204	Pro-Mark, Inc. Occupation Manager	07/03/96 08/05/96 09/03/96 09/18/96	\$10.00 \$10.00 \$10.00 \$35.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other Specify: Federal		Aggregate Year-to-Date \$243.00	

SUBTOTAL of Receipts This Page (optional) \$11710.00

TOTAL This Period (last page this line number only)

